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VIA OVERNIGHT UPS

September 30, 2011

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743-3813

***RE: WC Docket 05-68 – Prepaid Calling Card Certification and Request for Confidential Treatment for RNK Inc. d/b/a RNK Communications***

Dear Secretary Dortch:

Pursuant to *Prepaid Calling Card Order* in WC Docket No. 05-68,<sup>1</sup> and 47 C.F.R. §64.5001(c), please find enclosed the Officer Certification for RNK Inc. d/b/a RNK Communications (“RNK”) for the 2<sup>nd</sup> Quarter of 2011.

In addition, by this letter, RNK requests, pursuant to Sections 0.457 and 0.459 of the Federal Communications Commission’s (the “Commission”) rules,<sup>2</sup> confidential treatment of the traffic and revenue information contained in the attached certification.

The information for which RNK seeks confidential treatment consists of jurisdictional classification of its prepaid calling card telecommunications services and revenue data pertaining to such services that customarily would be guarded from competitors and would not be made routinely available for public inspection.<sup>3</sup> The revenue data results from RNK’s provision of interstate and international prepaid telecommunications services, as well as a percentage breakdown of its prepaid calling card minutes of use by jurisdiction (intrastate, interstate, and international.)

In other contexts, the Commission has recognized the confidential nature of this information when it collects similar information from telecommunications carriers.<sup>4</sup>

Moreover, the Freedom of Information Act (“FOIA”) protects such information from disclosure because the information includes “trade secrets and commercial or financial information . . . [that is] privileged or confidential.”<sup>5</sup> Public disclosure of this information could be used by RNK’s competitors to gain insight regarding RNK’s business and, perhaps, use it to

<sup>1</sup> *In the Matter of Regulation of Prepaid Calling Card Services*, Declaratory Ruling and Report and Order, 21 FCC Rcd 7290 (2006).

<sup>2</sup> 47 C.F.R. §0.457(d)(1)-(2).

<sup>3</sup> 47 C.F.R. §0.457(d)(2).

<sup>4</sup> See, e.g., *Instructions for Completing the Worksheet for Filing Contributions to Telecommunications Relay Service, Universal Service, Number Administration, and Local Number Portability Support Mechanisms*, Telecommunications Reporting Worksheet, FCC Form 499-A at 33 (March 2007) (instructing filers that they may request nondisclosure of the revenue information contained on Form 499-A).

<sup>5</sup> 5 U.S.C. §552(b)(4).

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their business advantage to undermine or unfairly target RNK's services or prices, or duplicate RNK's business plan, among other actions they might take. Such actions by competitors would result in competitive harm to RNK. As such, the information falls within the scope of Section 0.457 of the Commission's rules and should be afforded protection from public inspection.

In the event that RNK's request for confidential treatment is denied, RNK respectfully requests notice of that determination prior to making the confidential version of RNK's Officer Certification available to the public.

In accordance with the Commission's rules, an original and four (4) copies of the public version, and one (1) original of the confidential version (contained in a sealed envelope) of this filing are being filed with the Office of the Secretary.

Should you have any questions regarding this filing, please contact me at. (781) 613-9148. Please date-time stamp the extra copy of this filing and return it in the envelope provided.

Sincerely,



Matthew Tennis  
Sr. Counsel  
Manager of Regulatory Affairs

cc: Chief, Pricing Policy Division, Wireline Competition Bureau, Federal  
Communications Commission (redacted version)  
FCC Contract Copier, via email, [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com) (redacted version)  
Electronic Filing via ECFS (redacted version)

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PREPAID CALLING CARD CERTIFICATION OF COMPLIANCE  
by RNK INC., d/b/a RNK COMMUNICATIONS

I, Sanford McMurtry, here undersigned Vice President of RNK Inc., d/b/a RNK Communications ("RNK"), a Massachusetts corporation, duly authorized to provide telecommunications and prepaid calling card services within the United States, hereby declare and certify in accordance with Federal Communications Commission requirements:<sup>1</sup>

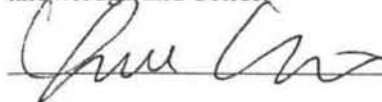
1. RNK provides that for the reporting period consisting of the Second Quarter of 2011, RNK reports a jurisdictional breakout of █% intrastate, █% interstate and █% international calling card minutes;
2. RNK provides that █% of its prepaid calling card revenue is interstate and █% international (excluding revenue that is exempt under the military exemption adopted in the order) and therefore subject to the universal service assessment for the reporting period covering the Second Quarter of 2011;
3. RNK is making the required Universal Service Fund contribution based on the above reported information; and
4. RNK has provided the required information, i.e.; prepaid calling card percentage of interstate use (PIU) factors, and call volumes from which these factors were calculated, based on not less than a one-day representative sample, to those carriers from which RNK purchases transport services.

Attest:

  
SANFORD MCMURTRY,  
Vice President, RNK Inc., d/b/a RNK Communications

Commonwealth of Massachusetts  
Norfolk, ss.

Sanford McMurtry personally appeared before me this 30<sup>th</sup> day of September, 2011, and attested voluntarily and knowingly that the aforementioned statement is true to the best of his knowledge and belief.



Notary Public

My Commission expires: 10/12/12

<sup>1</sup> Prepaid Calling Card Order in WC Docket No. 05-68